

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LA UNIÓN DEL PUEBLO ENTERO, FRIENDSHIP-
WEST BAPTIST CHURCH, THE ANTI-
DEFAMATION LEAGUE AUSTIN, SOUTHWEST,
AND TEXOMA REGIONS, SOUTHWEST VOTER
REGISTRATION EDUCATION PROJECT, TEXAS
IMPACT, MEXICAN AMERICAN BAR
ASSOCIATION OF TEXAS, TEXAS HISPANICS
ORGANIZED FOR POLITICAL EDUCATION, JOLT
ACTION, WILLIAM C. VELASQUEZ INSTITUTE,
FIEL HOUSTON INC., ISABEL LONGORIA, and
JAMES LEWIN,**

Plaintiffs,

- against -

**GREGORY W. ABBOTT, in his official capacity as
Governor of Texas, JOSE A. ESPARZA, in his official
capacity as Deputy Secretary of State of Texas,
WARREN K. PAXTON, in his official capacity as
Attorney General of Texas, and LUPE C. TORRES, in
her official capacity as Medina County Elections
Administrator,**

Defendants.

Case No. 5:21-cv-844-FB

MOTION FOR ADMISSION *PRO HAC VICE* OF PATRICK A. BERRY

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Patrick A. Berry, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Plaintiffs Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Texas Impact, James Lewin, and Isabel Longoria in this case, and would respectfully show the Court as follows:

1. I am an attorney and a member of the law firm Brennan Center for Justice at NYU School of Law with offices at:

120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 925-8754
Facsimile: (212) 463-7308

2. Since 2019, I have been and presently am a member of and in good standing with the Bar of the State of New York. My New York bar license number is 5723135.

3. I have been admitted to practice before the following courts:

New York State

Admitted: October 16, 2019

4. I am presently a member in good standing of the bars of the courts listed above.

5. I have not previously applied to appear *pro hac vice* in this District Court.

6. I have never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.

7. I have not been charged, arrested, or convicted of a criminal offense or offenses.

8. I have read and am familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. I will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or I have co-counsel in this case who is admitted to practice before the U.S. District Court for the Western District of Texas:

Sean Morales-Doyle
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8363

Should the Court grant applicant's motion, I shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-l(f)(2), made payable to: Clerk, U.S. District Court.

Wherefore, I pray that this Court enter an order permitting the admission of Patrick A. Berry to the Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,



Patrick A. Berry

N.Y. Bar No. 5723135

BRENNAN CENTER FOR JUSTICE AT

NYU SCHOOL OF LAW

120 Broadway, Suite 1750

New York, NY 10271

Telephone: (646) 925-8754

Facsimile: (212) 463-7308

patrick.berry@nyu.edu

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 8th day of September, 2021.



Patrick A. Berry